

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Evelyn Kepple fka Evelyn Picinich
Debtor(s)

CHAPTER 13

Toyota Motor Credit Corporation
Movant

vs.

NO. 18-02826 RNO

Evelyn Kepple fka Evelyn Picinich
Debtor(s)

Daniel Sherer
Co- Debtor(s)

11 U.S.C. Section 362 and 1301 (c)

Charles J. DeHart, III
Trustee

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Toyota Motor Credit Corporation has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion, then on or before **December 27, 2019** you or your attorney must do all of the following:

- (a) file an answer explaining your position at:
United States Bankruptcy Court
197 South Main Street
Wilkes-Barre, PA 18701

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant's attorney:
James C. Warmbrodt, Esquire
KML Law Group, P.C.
Suite 5000 - BNY Independence Center
701 Market Street
Philadelphia, PA 19106-1532

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Robert N. Opel, the United States Bankruptcy Judge, in at the United States Bankruptcy Court, 197 South Main Street, Wilkes-Barre, PA 18701 on **January 16, 2020 at 9:30am** or as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 570-831-2500 to find out whether the hearing has been canceled because no one filed an answer.

/s/ James C. Warmbrodt, Esquire

James C. Warmbrodt, Esquire
Attorneys for Movant/Applicant
Main Phone #: 215-627-1322

December 9, 2019